

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**In re:**

:

: Case No.: **19-23519**

**Michelle A. Merella**

: Chapter 13

: Judge **Gregory L. Taddonio**

**Debtor(s)**

: \* \* \* \* \*

\*

**PNC Bank, N.A.**

:

: Date and Time of Hearing

**Movant,**

: Place of Hearing

vs

: January 13, 2021 at 09:30 a.m.

**Michelle A. Merella**

:

: Courtroom A on the 54th Floor of the U.S.

**Ronda J. Winnecour**

: Steel Tower

: 600 Grant Street, Pittsburgh, PA 15219

**Respondents.**

:

**NOTICE OF HEARING AND RESPONSE DEADLINE  
REGARDING MOTION OF PNC BANK, N.A. FOR RELIEF FROM AUTOMATIC  
STAY WITH 30 DAY WAIVER**

TO THE RESPONDENT(S):

You are hereby notified that the Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than January 4, 2021 (i.e., seventeen (17) days after the date of service below), in accordance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the presiding judge as found on the Court's webpage at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled. The Creditor hereby waives the right under 11 U.S.C. § 362(e) to a hearing on this motion within thirty (30) days of the date it is filed.

You should take this Notice and the Motion to a lawyer at once.

A **video conference** hearing will be held on January 13, 2021, at 09:30 a.m. before Judge Gregory L. Taddonio. All parties wishing to appear by video conference must register by submitting a video conference registration form via the link published on Judge Taddonio's website (which can be found at <http://www.pawb.uscourts.gov/judge-taddonios-video-conference-hearing-information>) no later than **4 p.m. on the business day** prior to a scheduled

hearing. All counsel and parties participating by video conference shall comply with Judge Taddonio's *Modified Procedures for Remote Participation* (effective October 1, 2020), (which can be found at <http://www.pawb.uscourts.gov/sites/default/files/pdfs/glt-proc-appearances.pdf>).

Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Date of Service: December 18, 2020

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Edward H. Cahill (0088985)

Stephen R. Franks (0075345)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
**Michelle A. Merella** : Case No.: **19-23519**  
Debtor(s) : Chapter 13  
              : Judge Gregory L. Taddonio  
              : \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*  
              : \*  
**PNC Bank, N.A.** : Date and Time of Hearing  
              : Movant, Place of Hearing  
              : vs January 13, 2021 at 09:30 a.m.  
              :  
**Michelle A. Merella** : Courtroom A on the 54th Floor of the U.S.  
              : Steel Tower  
**Ronda J. Winnecour** : 600 Grant Street, Pittsburgh, PA 15219  
              : Respondents. :

**CERTIFICATE OF SERVICE OF NOTICE OF MOTION, RESPONSE DEADLINE,  
AND HEARING DATE REGARDING MOTION FOR RELIEF FROM AUTOMATIC  
STAY WITH 30 DAY WAIVER**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on  
(date) December 18, 2020

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:  
first-class mail and/or electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: December 18, 2020

By: /s/ Karina Velter  
Signature  
Karina Velter, Esquire  
Typed Name

P.O. Box 165028, Columbus, OH 43216-5028

Address

614-220-5611

Phone No.

94781

List Bar I.D. and State of Admission

Karina Velter, Attorney for Creditor, Manley Deas Kochalski LLC, P.O. Box 165028, Columbus, OH 43216-5028 (notified by ecf)

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov (notified by ecf)

Ronda J. Winnecour, Chapter 13 Trustee, Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219 (notified by ecf)

Kenneth Steidl, Attorney for Debtor, Steidl & Steinberg, Suite 2830 Gulf Tower, 707 Grant Street, Pittsburgh, PA 15219 (notified by ecf)

Michelle A. Merella, Debtor, 127 Dominion Lane, West Newton, PA 15089 (notified by regular US Mail)

Michelle A. Merella, Debtor, 127 Dominion Ln, West Newton, PA 15089-1298 (notified by regular US Mail)

Westmoreland County Tax Claim Bureau, Party of Interest, 40 N. Pennsylvania Avenue, Suite 109, Greensburg, PA 15601 (notified by regular US Mail)